

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 21cr10182
)	
v.)	Violations:
)	
MICHAEL ROBERT MOURA,)	<u>Count One</u> : Felon in Possession of Firearms
)	(18 U.S.C. § 922(g)(1))
)	
Defendant)	<u>Count Two</u> : Receipt and Possession of
)	Unregistered Firearm
)	(26 U.S.C. § 5861(d))
)	
)	<u>Forfeiture Allegation</u> :
)	(18 U.S.C. § 924(d); 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

Felon in Possession of Firearms
(18 U.S.C. § 922(g)(1))

The Grand Jury charges:

On or about April 28, 2021, in the District of Massachusetts, the defendant,

MICHAEL ROBERT MOURA

knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms that is, a Glock model 22, .40 caliber pistol, bearing serial number KCC700, and a Colt model M16 A2 rifle, bearing serial number 8108394,

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

Receipt and Possession of Unregistered Firearm
(26 U.S.C. § 5861(d))

The Grand Jury further charges that:

On or about April 28, 2021, in the District of Massachusetts, the defendant,

MICHAEL ROBERT MOURA

knowingly received and possessed a firearm, that is, a fully-automatic Colt model M16 A2 rifle, bearing serial number 8108394, which was not registered to him in the National Firearms Registration and Transfer Record as required by Title 26, United States Code, Section 5841.

All in violation of Title 26, United States Code, Section 5861(d)..

FORFEITURE ALLEGATION
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

Upon conviction of the offense in Count One, in violation of violation Title 18, United States Code, Section 922(g)(1), or the offense in Count Two, in violation of Title 26, United States Code, Section 5861(d), set forth in this Indictment, the defendant,

MICHAEL ROBERT MOURA,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. a Glock model 22, .40 caliber pistol, bearing serial number KCC700;
- b. a Colt model M16 A2 rifle, bearing serial number 8108394;
- c. three Glock .40 caliber magazines;
- d. two M16 rifle magazines;
- e. 183 rounds of 9mm ammunition; and,
- f. 162 rounds of .223 caliber rifle ammunition.

If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

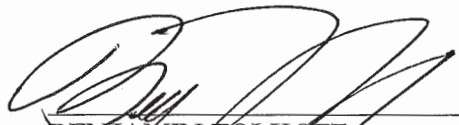
it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461.

A TRUE BILL



FOREPERSON



BENJAMIN POLKOFF
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: June 8, 2021
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK



at 1:06 PM

6/8/21